West Virginia Department of Environmental Protection

Joe Manchin, III Governor

Division of Air Quality

Randy C. Huffman Cabinet Secretary

Draft Permit to Modify



R13-1686G

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

E. I. DuPont deNemours and Company Washington Works 107-00001

John A. Benedict
Director

Issued: DRAFT • Effective: DRAFT

This permit will supercede and replace Permit R13-1686F.

Facility Location: Washington, Wood County, West Virginia
Mailing Address: P. O. Box 1217; Washington, WV 26181-1217

Facility Description: Nylon Polymer Processing

NAICS Code: 325211

UTM Coordinates: 442.31 km Easting • 4,346.8 km Northing • Zone 17

Permit Type: Modification

Description of Change: Revised emission limits for the natural gas combustion sources based on more accurate

vendor information and/or updated EPA AP-42 factors. There are no physical changes

associated with this modification.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is subject to 45CSR30. The permittee has the duty to update the facility's Title V (45CSR30) permit application to reflect the changes permitted herein.

Table of Contents

2.0.	General (Conditions	6
	2.1.	Definitions	6
	2.2.	Acronyms	7
	2.3.	Authority	7
	2.4.	Term and Renewal	7
	2.5.	Duty to Comply	7
	2.6.	Duty to Provide Information	7
	2.7.	Duty to Supplement and Correct Information	
	2.8.	Administrative Permit Update	8
	2.9.	Permit Modification	
	2.10	Major Permit Modification	8
	2.11.	Inspection and Entry	8
	2.12.	Emergency	8
	2.13.	Need to Halt or Reduce Activity Not a Defense	9
	2.14.	Suspension of Activities	
	2.15.	Property Rights	
	2.16.	Severability	
	2.17.	Transferability	
	2.18.	Notification Requirements	
	2.19.	Credible Evidence	10
3.0.	Facility-V	Vide Requirements	11
	3.1.	Limitations and Standards	11
	3.2.	Monitoring Requirements	11
	3.3.	Testing Requirements	11
	3.4.	Recordkeeping Requirements	12
	3.5.	Reporting Requirements	13
4.0.	Source-Sp	pecific Requirements	14
	4.1.	Limitations and Standards	
	4.2.	Monitoring Requirements	
	4.3.	Testing Requirements	17
	4.4.	Recordkeeping Requirements	
	4.5.	Reporting Requirements	
CER	FIFICATIO	N OF DATA ACCURACY	19

1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Type and Date of Change	Control Device
252-06S	252-60	MPW2 Z2 PCS Filter Receiver (#17 Vac Conveyor)	1991	n/a	None	
252-61S	252-61	MPW2 #14/17 Recycle PCS	1991	30,000 ACFM	None	
252-63S	252-63	MPW2 N Hold N2 Loop (North MPW2 Dryer)	1991	45 ACFM	None	
252-64S	252-64	MPW2 S Hold N2 Loop (South MPW2 Dryer)	1991	45 ACFM	None	
252-73S	252-73	MPW2 Packout	1968	155,000	None	
252-80S	252-80	MPW2 5 th Level S/C Exhaust	1991	9,100 ACFM	None	252-80C
252-81S	252-81	MPW2 5 th Level S/C Vacuum	1996	250 ACFM	Modification	252-81C
254-01S	254-01	Dowtherm Vaporizer #1	1968	14 MMBtu/hr	Modification	
254-02S	254-02	Dowtherm Vaporizer #2	1968	14 MMBtu/hr	Modification	
254-05S	254-05	Dowtherm Vaporizer #5	1968	16.5 MMBtu/hr	Modification	
254-06S	254-06	Dowtherm Vaporizer #6	1991	18 MMBtu/hr	Modification	
254-07S	254-07	MPW Dow Vac Pump #1	1994	42.7 ACFM	None	
254-08S	254-08	MPW Dow Vac Pump #2	1994	42.7 ACFM	None	
255-06S	255-06	MPW2 #11 Recycle PCS	1977	30,000 ACFM	None	
255-07S	255-07	MPW2 #12/14 Recycle PCS	1977	30,000 ACFM	None	
255-08S	255-08	MPW2 #15 Recycle PCS	1977	30,000 ACFM	None	
255-55S	255-55	MPW2 #12 Silo Bulk Load System	1976	40,000 ACFM	None	255-55C
255-56S	255-56	MPW2 #4 PCS	1977	13,000 ACFM	None	
255-57S	255-57	MPW2 #5 PCS	1977	13,000 ACFM	None	
255-58S	255-58	MPW2 #6 PCS	1977	13,000 ACFM	None	
255-59S	255-59	Z-1 Box Line Vacuum PCS	1976	50,000 pph	None	
256-03S	256-03	MPW2 Insulation Room	1977	3,000 pph	None	256-03C
256-04S	256-04	MPW2 Satellite Dust Hood	1977	8,000 ACFM	None	256-04C
256-05S	256-05	MPW2 Satellite Exhaust	1977	30 pph	None	
256-06S	256-06	M2W2 Satellite Feed PCS	1977	500 ACFM	None	
256-110S	256-110	MPW2 Z-2 Feed PCS A	1991	980 ACFM	None	
256-111S	256-111	MPW2 Z-2 Feed PCS R	1991	190 ACFM	None	
256-112S	256-112	MPW2 Z-2 Feed PCS S	1991	190 ACFM	None	
256-113S	256-113	MPW2 Z-2 Feed PCS T	1991	190 ACFM	None	
256-114S	256-114	Z-2 Extruder Die Exhaust	1991	4.8 pph	None	256-114C
256-115S	256-115	MPW2 Z-2 Extruder Vacuum Vent	1991	100 ACFM	None	

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Type and Date of Change	Control Device
256-116S	256-116	MPW2-Z-2 Cooler Conveying System	1991	1755 ACFM	None	256-116C
256-117S	256-117	MPW2 Z-2 Cooler	1991	5.6 PU/hr	None	256-117C
256-119S	256-119	MPW2 Dryer	1991	8500 ACFM	None	256-119C
256-120S	256-120	MPW2 Z-2 Feeder Exhaust	1991	750 ACFM	None	256-120C
256-60S	256-60	MPW2 Pre-Polymerizer	1977	10 PU/hr	None	
256-62S	256-62	MPW2 Separator	1991	10 PU/hr	None	256-62C
256-59S	256-59	MPW2 Pre-Evaporator	1991	10 PU/hr	None	
256-71S	256-71	MPW2 Finisher	1976	10 PU/hr	None	
256-72S	256-72	MPW2 Die Exhaust	1976	4.8 pph	None	

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_X	Nitrogen Oxides
CBI	Confidential Business	NSPS	New Source Performance
	Information		Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	$PM_{2.5}$	Particulate Matter less than 2.5
C.F.R. or CFR	Code of Federal Regulations		μm in diameter
CO	Carbon Monoxide	PM_{10}	Particulate Matter less than
C.S.R. or CSR	Codes of State Rules		10μm in diameter
DAQ	Division of Air Quality	Ppb	Pounds per Batch
DEP	Department of Environmental	Pph	Pounds per Hour
	Protection	Ppm	Parts per Million
dscm	Dry Standard Cubic Meter	Ppm _V or	Parts per Million by Volume
FOIA	Freedom of Information Act	ppmv	
HAP	Hazardous Air Pollutant	PSD	Prevention of Significant
HON	Hazardous Organic NESHAP		Deterioration
HP	Horsepower	Psi	Pounds per Square Inch
lbs/hr	Pounds per Hour	SIC	Standard Industrial
LDAR	Leak Detection and Repair		Classification
M	Thousand	SIP	State Implementation Plan
MACT	Maximum Achievable	SO_2	Sulfur Dioxide
1121202	Control Technology	TAP	Toxic Air Pollutant
MDHI	Maximum Design Heat Input	TPY	Tons per Year
MM	Million	TRS	Total Reduced Sulfur
MMBtu/hr or	Million British Thermal Units	TSP	Total Suspended Particulate
mmbtu/hr	per Hour	USEPA	United States Environmental
MMCF/hr or	Million Cubic Feet per Hour		Protection Agency
mmcf/hr		UTM	Universal Transverse Mercator
NA	Not Applicable	VEE	Visual Emissions Evaluation
NAAQS	National Ambient Air Quality	VOC	Volatile Organic Compounds
&	Standards	VOL	Volatile Organic Liquids
NESHAPS	National Emissions Standards for Hazardous Air Pollutants	, 31	

2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;

2.4. Term and Renewal

2.4.1. This permit supersedes and replaces previously issued Permit R13-1686F. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Applications R13-1686G, R13-1686F, R13-1686E, R13-1686D, R13-1686C, R13-1686B, R13-1686A, and R13-1686, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
 - [45CSR§§13-5.11 and -10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable

to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. Open burning. The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
 [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. **[45CSR§6-3.2.]**
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health Environmental Health require a copy of this notice to be sent to them.

[40CFR§61.145(b) and 45CSR§34]

- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1] [State Enforceable Only]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown. **[45CSR§13-10.5.]**
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.

 [45CSR\$11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary

exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15)]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§4. State Enforceable Only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAO:

Director WVDEP Division of Air Quality 601 57th Street Charleston, WV 25304-2345 If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR30 Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Emission rates to the atmosphere from the following emission points shall not exceed the following:

Emission	Equipment Description	Regulated	Emission Limits		
Point		Pollutant	pph	tpy	
252-60	Z-2 PCS Filter Receiver	Particulate	0.02	0.07	
252-61	#17 Recycle PCS	Particulate	0.01	0.01	
252-63	N Hold N2 Loop	Particulate	0.01	0.01	
252-64	S Hold N2 Loop	Particulate	0.01	0.01	
252-73	MPW Packout	Particulate	1.30	1.54	
252-80	5 th Level S/C Exhaust	Particulate	0.01	0.04	
252-81	5 th Level S/C Vacuum	Particulate	0.01	0.01	
		CO	0.11	0.47	
		NOx	2.66	11.66	
254-01	MPW #1 Vaporizer	Particulate	0.17	0.74	
		SO2	0.01	0.04	
		VOC	0.03	0.13	
		CO	0.11	0.47	
		NOx	2.66	11.66	
254-02	MPW #2 Vaporizer	Particulate	0.17	0.74	
		SO2	0.01	0.04	
		VOC	0.03	0.13	
		CO	0.13	0.55	
		NOx	3.14	13.74	
254-05	MPW #5 Vaporizer	Particulate	0.20	0.87	
		SO2	0.01	0.05	
		VOC	0.04	0.16	
		CO	0.62	2.71	
		NOx	5.12	22.42	
254-06	MPW #6 Vaporizer	Particulate	0.14	0.59	
		SO2	0.02	0.05	
		VOC	0.10	0.43	
254-07	MPW West Dow Vacuum Pump	Particulate	0.36	1.58	
254-08	MPW East Dow Vacuum Pump	Particulate	0.36	1.58	
255-06	#11 Recycle PCS	Particulate	0.01	0.02	
255-07	#12/14 Recycle PCS	Particulate	0.01	0.02	
255-08	#15 Recycle PCS	Particulate	0.01	0.02	
255-55	#12 Silo Bulk Load System	Particulate	0.08	0.35	
255-56	MPW #4 PCS	Particulate	0.02	0.08	
255-57	MPW #5 PCS	Particulate	.02	0.09	
255-58	MPW #6 PCS	Particulate	0.02	0.08	
255-59	Z-2 Box Line Vacuum PCS	Particulate	0.11	0.46	
256-03	MPW Insulation Room	Particulate	0.01	0.02	
256-04	MPW Satellite Dust Hood	Particulate	0.01	0.04	
256-05	MPW2 Satellite Exhaust	CO	0.01	0.01	
		Particulate	0.01	0.04	
		VOC	0.01	0.01	
256-06	MPW Satellite Feed PCS	Particulate	0.01	0.01	

256-60	MPW2 Evaporator #2	Particulate	14.50	1.51
256-62	MPW2 Vessel #1	Particulate	0.96	4.18
256-70	MPW-2 HMD Removal Column	Particulate	0.44	1.93
		CO	0.05	0.22
256-71	MPW2 Vessel #2	Particulate	0.42	1.81
		VOC	0.03	0.11
256-72	MPW Die Exhaust Hood	CO	0.06	0.23
		Particulate	0.43	1.88
		VOC	0.03	0.12
256-110	Z-2 Feed PCS A	Particulate	0.01	0.05
256-111	Z-2 Feed PCS R	Particulate	0.01	0.03
256-112	Z-2 Feed PCS S	Particulate	0.02	0.06
256-113	Z-2 Feed PCS T	Particulate	0.01	0.03
		CO	0.03	0.11
256-114	Z-2 Extruder Die Exhaust	Particulate	0.01	0.04
		VOC	0.03	0.11
		CO	0.03	0.11
256-115	Z-2 Extruder Vacuum Vent	Particulate	0.08	0.35
		VOC	0.01	0.01
256-116	Z-2 Cooler Conveying System	Particulate	0.02	0.07
256-117	Z-2 Cooler	Particulate	0.03	0.11
256-119	MPW2 Dryer	Particulate	0.16	0.71
256-120	Z-2 Feeder Exhaust	Particulate	0.03	0.11

4.1.2. The permittee shall not exceed maximum hourly production rates and maximum yearly production rates as listed in the following table:

	Maximum Hourly	Maximum Annual
Product Name	(Production Units per hour)	(Production Units per year)
6/6 Nylon		
(a) Virgin Nylon Basis	10.5	91,980
(b) Total Nylon Basis	10.9	95,660
Nylon Compounded Resins	4.8	42,048

- 4.1.3. The pertinent sections of 45CSR7 applicable to this facility include, but are not limited to, the following:
 - 4.1.3.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7. [45CSR7-3.1]
 - 4.1.3.2. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1 is required to have a full enclosure and be equipped with a particulate matter control device. [45CSR7-3.7]
 - 4.1.3.3. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule. [45CSR7-4.1]

- 4.1.3.4. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. [45CSR7-5.1]
- 4.1.3.5. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmosphere entrainment. [45CSR7-5.2]
- 4.1.3.6. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option on conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices. [45CSR7-8.1]
- 4.1.3.7. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions. [45CSR7-8.2]
- 4.1.3.8. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. [45CSR7-9]
- 4.1.4. For the natural gas-fired process heaters [254-01S, 254-02S, 254-05S, and 254-06S], the permittee shall comply with the 112(j) case-by-case Boiler MACT requirements established in the most current version of permit R13-2838. [45CSR34]
- 4.1.5. Changes to any 112(j) case-by-case Boiler MACT requirements shall not be less stringent than required by R13-2838. [45CSR34]
- 4.1.6. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

[45CSR§13-5.11.]

4.2. Monitoring Requirements

4.2.1. To maintain compliance with the requirements in section 4.1.3, the permittee shall conduct opacity monitoring for the gas-fired process heaters 254-01S, 254-02S, 254-05S, and 254-06S.

Monitoring shall be conducted at least once per month with a maximum of forty-five (45) days between consecutive readings. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within twenty-four (24) hours of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within twenty-four (24) hours after the visible emission and the sources are operating at normal conditions.

4.3. Testing Requirements

4.3.1. Reserved.

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
 - a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.4.4. In order to verify compliance with the annual emission rates set forth in section 4.1.1 of this permit, the permittee shall submit to the Director of the Division of Air Quality, upon his request, emissions data or have production data available for inspection.
- 4.4.5. The permittee shall maintain records of the maintenance associated with the gas-fired process heaters [254-01S, 254-02S, 254-05S, and 254-06S]. Records shall also be maintained of cold startup and shutdown events.
- 4.4.6. To demonstrate compliance with the visual emissions monitoring requirements in section 4.2.1 of this permit, the permittee shall maintain documentation of the date and time of each visible emission check, the name of the responsible observer, the results of the check, and if necessary, all corrective actions taken. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (OOS) or equivalent. These records shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request.
- 4.4.7. To demonstrate compliance with the emission rates for the gas-fired process heaters [254-01S, 254-02S, 254-05S, and 254-06S], the permittee shall maintain records of monthly gas consumption. [§60.48c(g)(2)]

4.5. Reporting Requirements

4.5.1. Reserved.

CERTIFICATION OF DATA ACCURACY

	I, the undersigned, hereby certify	y that, based on information and	belief formed after reasonable
inquiry, all info	rmation contained in the attached	i	, representing the
period beginning	g a	and ending	, and any supporting
documents apper	aded hereto, is true, accurate, and co	omplete.	
Signature ¹ (please use blue ink)	Responsible Official or Authorized Representative		Date
Name & Title (please print or type)	Name	Title	
Telephone No.		Fax No	

- This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
 - a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.